

IN THE U.S. FEDERAL DISTRICT COURT OF MARYLAND

FILED
LOGGED
AUG 22 2022
AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

Gary Hamilton)	Case No.: 19-1489
)	
Plaintiff,)	MOTIONS FOR ENLARGEMENT
)	OF TIME AND MOTION FOR
)	COURT TO APPOINT
)	REPLACEMENT PLAINTIFF
)	COUNSEL
v.)	
)	
THE SECRETARY OF THE United States)	TITLE 28 U.S.C.S.
Department of the Navy, Carlo Del Tori)	SECTION 1915(d)]
Defendant)	
)	

**PLAINTIFF'S MOTIONS (THOUGH COUNSEL) FOR ENLARGEMENT OF TIME BEYOND
TRIAL AND RESET ACCORDINGLY FOR REPLACEMENT OF PRESENT COUNSELOR WITH A
COURT APPOINTED ATTORNEY WITH COMPLEX EMPLOYMENT
DISCRIMINATION/RETALIATION LITIGATION EXPERIENCE**

Plaintiff respectfully moves the Court though counsel (Exhibit 1) to enlarge the time to engage a Replacement Counsel. Counsel would need sufficient time to familiarize his/her-self of the case, to conduct pre-trial briefs and motions, and finally prepare for trial. This motion for enlargement of time is required in such a time extension of an **REASONABLE TIME of at least one-two months**. Such time extension is essential for preparation of pretrial briefs, and at such time to allow for either a legal defense fund defense attorney or private attorney to enter his/her appearance. and conduct activities discussed above..

The subject motions will be filed, though Counsel, with the Court on August 22, 2022 11 a.m. via hand delivery and prior to notification of the same this p.m. August 21, 2022 of the current Counsel of record.